Richard G. Menaker (RM-4716)
Allison C. Pierre (AP-8980)
Menaker & Herrmann LLP
10 East 40th Street
New York, New York 10016
(212) 545-1900
Attorneys for Defendants
Anthony Zumpano and Jeanne Ruh

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

ROXANNE TORRES BEECHER,

Plaintiff,

08 CIV. 6062

-against-

RIVERDALE RIDING CORPORATION d/b/a RIVER RIDGE EQUESTRIAN CENTER, CHARLES RUSTIN HOLZER a/k/a RUSTY HOLZER, ANTHONY ZUMPANO, JEANNE RUH, THEODORE BEALE, JR., a/k/a TEDDY BEALE, ABC CORPORATION, a fictitious corporation, and the COUNTY OF WESTCHESTER,

DECLARATION OF ANTHONY ZUMPANO

Defendants.

ANTHONY ZUMPANO, pursuant to 28 U.S.C. § 1746, declares as follows:

- 1. I am a defendant in the above-referenced action and am personally familiar with the matters set forth herein.
- 2. In 1997 or 1998, the owner of Riverdale Riding Corporation, which does business under the name River Ridge Equestrian Center ("River Ridge"), Charles

Rustin Holzer, hired me to work as a part-time stable manager at River Ridge which, among other things, operates a stable for boarding horses. I work full time for the New York Times. I am a delivery truck driver for the paper and have worked there since 1987.

- 3. My duties as a part-time stable manager were to insure the safety and care of the horses and manage the daily operation of the stable that housed them. I supervised the distribution of the horses' feed and medications. I also supervised the cleaning of the horses' stalls and any necessary minor repairs to the stable.
- 4. I performed my duties under the supervision of Holzer, who would instruct me about stable operations and maintenance. Holzer has at all times made the final decisions regarding stable management.
- 5. I had no involvement whatsoever in the preparation or filing of River Ridge's federal or state tax returns and had no contact with any bank with which it did business. I have no ownership interest in or control over River Ridge. I did not participate in any alleged attempt to evict plaintiff from River Ridge. Plaintiff continues to board her horse at River Ridge.
- 6. I have never communicated with Plaintiff by email, mail, or telephone.
- 7. I deny the allegations in the Amended Verified Complaint insofar as they concern me.

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Filed 05/13/2009

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I declare under penalty of perjury that the foregoing is true and correct.

Executed on May \$\int 2009.